

SHER TREMONTE LLP

November 3, 2022

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

So ordered
11/7/22
Alvin K. Hellerstein

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

Dear Judge Hellerstein:

I write on behalf of my client, Jona Rechnitz, the defendant in the above-referenced matter, to respectfully request travel authorization to Israel from November 23, 2022 to November 30, 2022. The purpose of the trip is to attend the bar mitzvah of the son of a close family friend, and to take Mr. Rechnitz's daughter, who turned twelve years old this year, on a bat mitzvah trip. The Court previously approved Mr. Rechnitz to travel to Israel with two of his sons during their respective bar mitzvah years and, as Your Honor knows, Mr. Rechnitz has traveled internationally both for work and to attend to personal affairs during his pretrial supervision without incident.¹

While Mr. Rechnitz has previously left his wife's passport with the FBI for the duration of his travel, his wife plans to accompany him on this trip; accordingly, Mr. Rechnitz proposes to leave the passports of his five children who will remain in the United States with the FBI for the duration of the trip. I have contacted AUSA Lara Pomerantz and Pretrial Services regarding the proposed travel, and Ms. Pomerantz has indicated that the government consents to the proposed travel.

I appreciate the Court's consideration.

Respectfully submitted,

/s/Noam Biale

Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel (via ECF)

¹ Moreover, as noted in a previous travel request, Mr. Rechnitz's recent trip to Japan allowed him to make a payment toward fulfilling his restitution obligation to COBA and those funds were transferred via both parties' counsel on November 2, 2022.